

JUN 14 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Redevelopment of Spectrum to
Encourage Innovation in the
Use of New Telecommunications
Technologies

ET Docket No. 92-9

RM-7981
RM-8004

**REPLY COMMENTS OF
NATIONAL PUBLIC RADIO, INC.**

National Public Radio, Inc. ("NPR") files these Reply Comments to the Supplemental Comments filed by Alcatel Network Systems, Inc. ("Alcatel") in the above-referenced Further Notice of Proposed Rule Making ("FNPRM") with specific reference to the proposed utilization of the 3.7 - 4.2 GHz band by terrestrial microwave users.

The Compromise Plan contained in Alcatel's Supplemental Comments, filed May 19, 1993, adequately addresses the issues raised by NPR in previous comments filed in this docket. In those Supplemental Comments, Alcatel retains the +10 offset between terrestrial channel center frequencies and satellite transponder frequencies. NPR shares Alcatel's grave assessment of the Joint Commenters proposal advocating a change to 40 MHz wideband channels for terrestrial microwave users.¹ This change would create an intolerable interference situation for the satellite users of this band since the 40 MHz terrestrial


¹Alcatel Attachment A, at paragraph 3.1.1.

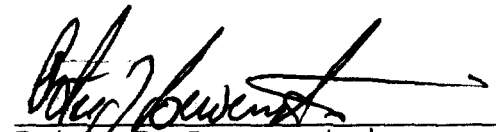
microwave channels and satellite transponder centers would be co-channel.


NPR believes that Alcatel's Compromise Plan which retains the ± 10 MHz offset between 20 and 10 MHz terrestrial microwave and satellite center frequencies is workable. Creative frequency planning and the use of notch filters has allowed the successful coexistence of both services in this band with the existing ± 10 MHz offset between terrestrial channel center frequencies and satellite transponder center frequencies.


Respectfully submitted,

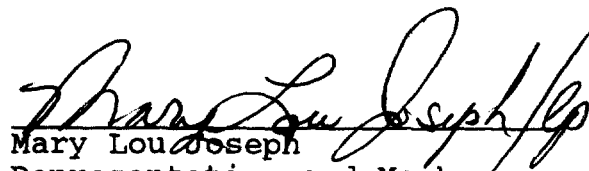
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